

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**THIRTY EIGHTH MONTHLY FEE STATEMENT OF FTI CONSULTING, INC. FOR  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES INCURRED AS FINANCIAL ADVISOR TO THE AD HOC COMMITTEE  
OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION CLAIMANTS FOR  
THE PERIOD FROM NOVEMBER 1, 2022 THROUGH NOVEMBER 30, 2022**

Name of Applicant:	FTI Consulting, Inc.
Authorized to provide Professional Services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 [ECF No. 553]
Period for which compensation and reimbursement is sought:	November 1, 2022 through November 30, 2022
Monthly Fees Incurred:	\$31,105.00

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1. The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifesciences Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Monthly Expenses Incurred: \$0.00

Total Fees and Expenses Due: \$31,105.00

This is a: X monthly \_\_\_\_\_interim \_\_\_\_\_final application

**PRIOR APPLICATIONS:**

<b>Docket No./Filed</b>	<b>Compensation Period</b>	<b>Requested</b>		<b>Approved</b>	
		<b>Fees</b>	<b>Expenses</b>	<b>Fees</b>	<b>Expenses</b>
Docket No. 635 Filed On 12/9/2019	9/19/2019 – 10/31/2019	\$778,791.50	\$680.61	\$771,291.50	\$680.61
Docket No. 741 Filed On 1/13/2020	11/1/2019 – 11/30/2019	\$827,575.00	\$899.41	\$820,075.00	\$899.41
Docket No. 852 Filed on 2/20/2020	12/1/2019 – 12/31/2019	\$802,036.50	\$2,284.19	\$794,536.50	\$2,284.19
Docket No. 916 Filed on 3/12/2020	1/1/2020 – 1/31/2020	\$774,662.00	\$11,530.84	\$767,162.00	\$11,530.84
Docket No. 1090 Filed on 4/27/2020	2/1/2020 – 2/29/2020	\$615,089.00	\$6,141.22	\$610,714.00	\$6,141.22
Docket No. 1171 Filed on 5/19/2020	3/1/2020 – 3/31/2020	\$561,863.50	\$67.08	\$557,488.50	\$67.08
Docket No. 1251 Filed on 6/10/2020	4/1/2020 – 4/30/2020	\$428,303.00	\$1,732.28	\$423,928.00	\$1,732.28
Docket No. 1379 Filed on 7/13/2020	5/1/2020 – 5/31/2020	\$303,367.00	\$4,325.26	\$298,992.00	\$4,325.26
Docket No. 1651 Filed on 9/2/2020	6/1/2020 – 6/30/2020	\$374,753.00	\$96.90	\$372,253.00	\$ 96.90
Docket No. 1725 Filed on 9/25/2020	7/1/2020 – 7/31/2020	\$446,975.50	\$0.00	\$444,475.50	\$0.00
Docket No. 1850 Filed on 10/26/2020	8/1/2020 – 8/31/2020	\$261,092.00	\$108.25	\$258,592.00	\$108.25
Docket No. 1950 Filed on 10/26/2020	9/1/2020 – 9/30/2020	\$357,546.50	\$0.00	\$355,046.50	\$0.00
Docket No. 2031 Filed on 11/24/2020	9/19/2019 – 9/30/2020	\$44,462.00	\$0.00	\$41,462.60	\$0.00
Docket No. 2154 Filed on 12/18/2020	10/1/2020 – 10/31/2020	\$356,078.50	\$0.00	\$353,078.50	\$0.00
Docket No. 2308 Filed on 1/20/2021	11/1/2020 – 11/30/2020	\$450,827.00	\$0.00	\$447,827.00	\$0.00
Docket No. 2503 Filed on 3/17/2021	12/1/2020 – 12/31/2020	\$308,146.00	\$0.00	\$305,146.00	\$0.00
Docket No. 2504 Filed on 3/17/2021	1/1/2021 – 1/31/2021	\$493,773.50	\$0.00	\$490,773.50	\$0.00
Docket No. 2848 Filed on 5/12/2021	2/1/2021 – 2/28/2021	\$381,199.00	\$9.99	\$377,458.99	\$9.99
Docket No. 2849 Filed on 5/12/2021	3/1/2021 – 3/31/2021	\$513,645.00	\$0.00	\$509,895.00	\$0.00
Docket No. 3017 Filed on 6/11/2021	4/1/2021 – 4/30/2021	\$415,904.00	\$0.00	\$412,154.00	\$0.00
Docket No. 3225 Filed on 7/15/2021	5/1/2021 – 5/31/2021	\$363,711.00	\$40.00	\$360,001.00	\$40.00
Docket No. 3747 Filed on 9/9/2021	6/1/2021 – 6/30/2021	\$303,427.50	\$0.00	\$299,677.50	\$0.00

**PRIOR APPLICATIONS (cont.):**

<b>Docket No./Filed</b>	<b>Compensation Period</b>	<b>Requested</b>		<b>Approved</b>	
		<b>Fees</b>	<b>Expenses</b>	<b>Fees</b>	<b>Expenses</b>
Docket No. 3798 Filed on 9/21/2021	7/1/2021 – 7/31/2021	\$431,630.50	\$135.81	\$427,880.50	\$135.81
Docket No. 3941 Filed on 10/14/2021	8/1/2021 – 8/31/2021	\$284,159.00	\$20.94	\$280,409.00	\$20.94
Docket No. 4097 Filed on 11/11/2021	9/1/2021 – 9/30/2021	\$244,958.50	\$0.00	\$241,208.50	\$0.00
Docket No. 4225 Filed on 12/15/2021	10/1/2021 – 10/31/2021	\$368,998.50	\$40.00	\$367,498.50	\$40.00
Docket No. 4311 Filed on 1/26/2022	11/1/2021 – 11/30/2021	\$255,094.50	\$1,160.04	\$253,594.50	\$1,160.04
Docket No. 4312 Filed on 1/26/2022	12/1/2021 – 12/31/2021	\$192,786.50	\$0.00	\$191,286.50	\$0.00
Docket No. 4395 Filed on 2/25/2022	1/1/2022 – 1/31/2022	\$314,564.00	\$0.00	\$313,064.00	\$0.00
Docket No. 4654 Filed on 4/12/2022	2/1/2022 – 2/28/2022	\$181,198.50	\$8.00	\$178,888.84	\$8.00
Docket No. 4826 Filed on 5/16/2022	3/1/2022 – 3/31/2022	\$267,504.00	\$44.03	\$265,194.33	\$44.03
Docket No. 4833 Filed on 5/16/2022	4/1/2022 – 4/30/2022	\$175,704.00	\$0.00	\$173,394.33	\$0.00
Docket No. 4950 Filed on 7/12/2022	5/1/2022 – 5/31/2022	\$98,099.50	\$0.00	\$96,849.50	\$0.00
Docket No. 5005 Filed on 8/8/2022	6/1/2022 – 6/30/2022	\$53,624.00	\$0.00	\$52,374.00	\$0.00
Docket No. 5051 Filed on 8/31/2022	7/1/2022 – 7/31/2022	\$53,023.00	\$0.00	\$51,773.00	\$0.00
Docket No. 5132 Filed on 10/12/2022	8/1/2022 – 8/31/2022	\$35,470.00	\$0.00	\$34,220.00	\$0.00
Docket No. 5240 Filed on 11/15/2022	9/1/2022 – 9/30/2022	\$53,219.00	\$8.00	\$42,575.20	\$8.00
Docket No. 5341 Filed on 1/13/2023	10/1/2022 – 10/31/2022	\$30,107.50	\$0.00	\$0.00	\$0.00

Note: The fee examiner's agreed upon reductions of \$30,000, \$17,500, \$10,000, \$15,000, \$15,000, \$15,000, \$6,000, \$6,929, and \$5,000 were allocated evenly across fees from the first, second, third, fourth, fifth, sixth, seventh, eighth, and ninth interim period, respectively.

This statement (the “**Fee Statement**”) of FTI Consulting, Inc. (together with its wholly owned subsidiaries and independent contractors, “**FTI**”) as financial advisor to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants of Purdue Pharma L.P., *et al.* (the “**Committee**”) is submitted in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [ECF No. 529] and the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* [ECF No. 553] entered on November 21, 2019 and December 2, 2019, respectively, (the “**Orders**”). In support of this Fee Statement, FTI respectfully states as follows.

1. The fees and expenses for the period from November 1, 2022 through and including November 30, 2022 (the “**Fee Period**”) amount to:

Professional Fees	\$31,105.00
Expenses	<u>0.00</u>
<b>TOTAL</b>	<b><u>\$31,105.00</u></b>

2. If no timely and proper objection is made by a party-in-interest within fourteen (14) days after service of this Fee Statement, the Debtors are authorized to pay 80% of professional fees and 100% of out-of-pocket expenses. These amounts are presented below.

Professional Fees at 80%	\$24,884.00
Expenses at 100%	<u>0.00</u>
<b>TOTAL</b>	<b><u>\$24,884.00</u></b>

3. The professionals providing services, hourly billing rates, the aggregate hours worked by each professional, and the aggregate hourly fees for each professional during the Fee Period are set forth on the schedule annexed hereto as **Exhibit “A”**.
4. A summary of aggregate hours worked and aggregate hourly fees for each task code during the Fee Period is set forth on the schedule annexed hereto as **Exhibit “B”**.

5. Detailed time entry by task code during the Fee Period is set forth on the schedule annexed hereto as **Exhibit “C”**.
6. FTI reserves the right to request, in subsequent fee statements and applications, reimbursement of any additional expenses incurred during the Fee Period, as such expenses may not have been captured to date in FTI’s billing system.

#### **NOTICE AND OBJECTION PROCEDURES**

7. Objections to this Fee Statement, if any, must be filed with the Court and served upon the Notice Parties so as to be received no later than January 27, 2023 (the “**Objection Deadline**”), setting forth the nature of the objection and the amount of fees or expenses at issue (an “**Objection**”).
8. If no objections to this Fee Statement are filed and served as set forth above, the Debtors shall promptly pay eighty percent (80%) of the fees and one hundred percent (100%) of the expenses identified herein.
9. If an objection to this Fee Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Fee Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such an objection is not resolved, it shall be preserved and scheduled for consideration at the next interim fee application hearing to be heard by the Court.

Dated: New York, New York  
January 13, 2023

FTI CONSULTING, INC.  
Financial Advisors to the Ad Hoc Committee of  
Governmental and Other Contingent Litigation  
Claimants of Purdue Pharma L.P.

By: /s/ Matthew Diaz  
Matthew Diaz, Senior Managing Director  
1166 Avenue of the Americas, 15<sup>th</sup> Floor  
New York, New York 10036  
Telephone: (212) 499-3611  
Email: matt.diaz@fticonsulting.com

**EXHIBIT A****PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649****SUMMARY OF HOURS BY PROFESSIONAL****FOR THE PERIOD NOVEMBER 1, 2022 TO NOVEMBER 30, 2022**

<b>Professional</b>	<b>Position</b>	<b>Specialty</b>	<b>Billing Rate</b>	<b>Total Hours</b>	<b>Total Fees</b>
Diaz, Matthew	Sr Managing Director	Restructuring	\$ 1,325	12.2	\$ 16,165.00
Bromberg, Brian	Sr Director	Restructuring	975	10.4	10,140.00
Kurtz, Emma	Sr Consultant	Restructuring	750	6.4	4,800.00
<b>GRAND TOTAL</b>				<b>29.0</b>	<b>\$ 31,105.00</b>



**EXHIBIT B**

**PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649**  
**SUMMARY OF HOURS BY TASK**  
**FOR THE PERIOD NOVEMBER 1, 2022 TO NOVEMBER 30, 2022**

<b>Task Code</b>	<b>Task Description</b>	<b>Total Hours</b>	<b>Total Fees</b>
1	Current Operating Results & Events	14.5	\$ 14,447.50
2	Cash & Liquidity Analysis	1.1	1,457.50
7	Analysis of Domestic Business Plan	6.4	6,730.00
11	Prepare for and Attend Court Hearings	1.1	1,282.50
16	Analysis, Negotiate and Form of POR & DS	0.2	195.00
19	Case Management	0.6	795.00
20	General Mtgs with Debtor & Debtors' Prof	4.2	5,005.00
24	Preparation of Fee Application	0.9	1,192.50
<b>GRAND TOTAL</b>		<b>29.0</b>	<b>\$ 31,105.00</b>

## EXHIBIT C

PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649

## DETAIL OF TIME ENTRIES

FOR THE PERIOD NOVEMBER 1, 2022 TO NOVEMBER 30, 2022

Task Category	Date	Professional	Hours	Activity
1	11/1/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/3/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/4/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/7/2022	Diaz, Matthew	1.4	Review August operating report to evaluate financial performance.
1	11/7/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/8/2022	Kurtz, Emma	0.2	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/10/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/11/2022	Bromberg, Brian	0.9	Review monthly reporting report summary to provide comments.
1	11/11/2022	Diaz, Matthew	1.5	Review operating report presentation to the Committee.
1	11/11/2022	Kurtz, Emma	2.4	Prepare monthly operating report update for August.
1	11/11/2022	Kurtz, Emma	0.7	Prepare revisions to operating report update per comments from internal team.
1	11/11/2022	Kurtz, Emma	0.4	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/15/2022	Bromberg, Brian	1.1	Edit monthly operating report summary.
1	11/15/2022	Diaz, Matthew	0.8	Review updated analysis of the Debtors' August operating report.
1	11/16/2022	Bromberg, Brian	1.1	Finalize monthly operating report summary to incorporate updates from call.
1	11/16/2022	Diaz, Matthew	0.6	Review updated draft financial report.
1	11/16/2022	Diaz, Matthew	0.7	Review Monitor's report.
1	11/21/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/23/2022	Kurtz, Emma	0.2	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
1	11/28/2022	Kurtz, Emma	0.3	Prepare daily summary of dataroom updates, key docket filings and media coverage for distribution to the team.
<b>1 Total</b>			<b>14.5</b>	
2	11/7/2022	Diaz, Matthew	0.6	Review updated cash flow variance analysis.
2	11/11/2022	Diaz, Matthew	0.5	Review Debtors latest cash flow projections.
<b>2 Total</b>			<b>1.1</b>	
7	11/1/2022	Bromberg, Brian	0.7	Prepare for financial advisors call with the Debtors' advisors re: operations updates.
7	11/1/2022	Bromberg, Brian	0.9	Prepare summary for counsel re: operations updates.
7	11/9/2022	Bromberg, Brian	0.2	Review marketing status for assets.
7	11/15/2022	Bromberg, Brian	0.7	Prepare for bi-weekly update call with the Debtors' advisors re: operations.
7	11/15/2022	Bromberg, Brian	0.7	Prepare operations summary for counsel.
7	11/22/2022	Bromberg, Brian	0.2	Review Avrio operating data.
7	11/26/2022	Bromberg, Brian	0.9	Review cash distributions analysis.
7	11/29/2022	Bromberg, Brian	0.4	Prepare for bi-weekly call with Debtors' advisors re: operations.
7	11/29/2022	Bromberg, Brian	0.3	Prepare summary of update call for team.
7	11/30/2022	Diaz, Matthew	0.9	Review Avrio materials provided by the Debtor.
7	11/30/2022	Diaz, Matthew	0.5	Participate in call with Houlihan re: operations update from the Debtors.
<b>7 Total</b>			<b>6.4</b>	
11	11/16/2022	Bromberg, Brian	0.5	Participate in hearing re: fees.
11	11/16/2022	Diaz, Matthew	0.6	Attend (partial) the court hearing re fee applications and other topics.
<b>11 Total</b>			<b>1.1</b>	
16	11/8/2022	Bromberg, Brian	0.2	Review Sackler asset reports.
<b>16 Total</b>			<b>0.2</b>	
19	11/8/2022	Diaz, Matthew	0.6	Review of case open issues and related items.
<b>19 Total</b>			<b>0.6</b>	
20	11/1/2022	Bromberg, Brian	0.6	Participate in call with the Debtors' advisors re: business operations.
20	11/1/2022	Diaz, Matthew	0.8	Participate in call with the Debtors and the UCC to discuss case developments.
20	11/1/2022	Diaz, Matthew	0.5	Review materials to prepare for the call with the Debtors.
20	11/15/2022	Bromberg, Brian	0.5	Participate in b-weekly financial advisors call re: operations.
20	11/15/2022	Diaz, Matthew	0.7	Participate in call with the Debtor's and UCC's advisors to discuss business updates.

## EXHIBIT C

PURDUE PHARMA L.P., ET AL. - CASE NO. 19-23649

## DETAIL OF TIME ENTRIES

FOR THE PERIOD NOVEMBER 1, 2022 TO NOVEMBER 30, 2022

Task				
Category	Date	Professional	Hours	Activity
20	11/29/2022	Bromberg, Brian	0.5	Participate in bi-weekly call with Debtors' advisors re: operations updates.
20	11/29/2022	Diaz, Matthew	0.6	Participate in call with the Debtors' and UCC's advisors re: case updates.
<b>20 Total</b>			<b>4.2</b>	
24	11/1/2022	Diaz, Matthew	0.6	Review draft September fee application.
24	11/15/2022	Diaz, Matthew	0.3	Review of the 9th interim application.
<b>24 Total</b>			<b>0.9</b>	
<b>Grand Total</b>			<b>29.0</b>	